

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**RE: BAY STATE GAS COMPANY
STAFFING AND OTHER MATTERS**

DTE 06-31

SECOND SET OF INFORMATION REQUESTS OF LOCAL 273

UWUA 2-1:

- (a) Please provide a table showing staffing levels at Bay State Gas Company by job category or function as of January 1, 2005 and all changes in staffing levels (for all employees ---- union, management, non-union) from January 1, 2005 to date, by major job category or job function. Include in this table the date of any increases or reductions in staff (e.g. "June 1, 2005: added [or eliminated or relocated] 2 telephone service reps").
- (b) Please include a projection of changes to staffing levels through June 30, 2009.

UWUA 2-2:

Please provide a copy of any decision(s) of the Indiana Utility Regulatory Commission in Cause No. 42194 or any other docket involving the plans of NIPSCo to close maintenance facilities in Indiana.

UWUA 2-3:

(Exh. BSG-1, p. 16) Please provide all documents received or generated by NiSource or Bay State in connection with "the extensive investigation of IBM and other similar vendors" prior to entering into the IBM agreement. Include any and all scoring documents, evaluations or analyses of any proposals the company received. Also include any documents analyzing or addressing the capabilities or past performance of IBM.

UWUA 2-4:

(Exh. BSG-1, p. 9)

- (a) Please list by name or other description the planning, budget, strategic or other documents through which NiSource and Bay State "set policies and goals; develop and coordinate strategies and objectives; and implement programs that support those strategies and objectives," and

provide a copy of each such document for the period January 1, 2003 to date.

(b) To the extent not provided in response to (a), please list by name or other description the planning, budget, strategic or other documents through which NiSource and Bay State senior management communicate to “directors and managers” the corporate policies and goals and provide a copy of each such document for the period January 1, 2003 to date.

UWUA 2-5:

Please state the current position of Violet Sistovaris with NiSource, including a description of her duties. Include the dates and nature of any prior positions she held with the company.

UWUA 2-6:

Please list the name and title of each person at NiSource who plays any role in the setting of staffing levels at Bay State (including any increases or decreases to those staffing levels), including a description of the precise role each individual plays. To the extent that different individuals at NiSource have played a role in setting staffing levels over time, list the names and titles and relevant dates for each such person from January 1, 2003 to date.

UWUA 2-7:

Please provide a table listing the level of NiSource’s long-term and short-term debt, as of January and June for each year 2000 to 2006.

UWUA 2-8:

(Exh. BSG-1, pp. 19 - 20)

Had the DTE not ruled as it did in DTE 05-27, regarding the opening of this docket and the statements it made about staffing levels and Bay State’s relationship with NiSource, would there have been any staff reductions (whether already implemented or scheduled) at the Springfield customer contact center, within the Credit and Collections functions handled at the Springfield Operations Center, at the Billing Exceptions Group located in Brockton, at the Brockton Logistics Center, or at the Demand Side Management Group? If there would have been any staff reductions (actual or scheduled), please list the numbers of positions at each group, function or location listed above that would have been eliminated or relocated, and the date that this would have occurred.

Respectfully Submitted,

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